

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JAMES PHILLIPS, and ROBERT  
SAEMIAN,

Plaintiffs,

vs.

WIPRO LIMITED,

Defendant.

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CIVIL ACTION NO. 4:18-cv-00821

**PLAINTIFFS' SUPPLEMENTAL DESIGNATIONS**

Pursuant to the Court's April 20, 2022 Third Amended Scheduling Order (ECF 258), Plaintiffs James Phillips and Robert Saemian ("Plaintiffs") hereby designate the following trial witnesses:

<b>Name</b>	<b>Summary of Testimony</b>
James Phillips Contact through Kotchen & Low LLP	Mr. Phillips will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and termination by Wipro, his reapplication to the company, and harm from Wipro's discrimination.
Robert Saemian Contact through Kotchen & Low LLP	Mr. Saemian will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and termination by Wipro, and harm from Wipro's discrimination.
Dr. David Neumark Department of Economics 3151 Social Science Plaza University of California-Irvine Irvine, CA 92697-5100	Dr. Neumark will testify as a labor economist regarding the statistical significance of the hiring, promotion, and termination rates of South Asians and Indians vs. non-South Asians and non-Indians at Wipro. He will testify as to the opinions set forth in his initial report and reply report, and will also offer testimony to rebut the expert opinions of Dr. Stephen Bronars.
Dr. Ronil Hira 10040 Rolling River Run Laurel MD 20723	Dr. Hira will testify regarding Wipro's business model and the issues discussed in his reply expert report, including Dr. Hira's rebuttal to the expert opinions of Dr. Stephen Bronars and Dr. Suit Ganguly.
Brian Charles Contact through Kotchen	Mr. Charles will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of

& Low LLP	South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
James Gibbs Contact through Kotchen & Low LLP	Mr. Gibbs will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Dan Giordan Contact through Kotchen & Low LLP	Mr. Giordan will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Joseph Huffman Contact through Kotchen & Low LLP	Mr. Huffman will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Greg MacLean Contact through Kotchen & Low LLP	Mr. MacLean will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Fred Mersbach Contact through Kotchen & Low LLP	Mr. Mersbach will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Thomas Morrissey Contact through Kotchen & Low LLP	Mr. Morrissey will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Jacques Peay Contact through Kotchen & Low LLP	Mr. Peay will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Ardeshir Pezeshki Contact through Kotchen & Low LLP	Mr. Pezeshki will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
John Singer Contact through Kotchen & Low LLP	Mr. Singer will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Ricardo Valles Contact through Kotchen & Low LLP	Mr. Valles will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Jonathan Vaughters Contact through Kotchen & Low LLP	Mr. Vaughters will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.

Armin Vogl Contact through Kotchen & Low LLP	Mr. Vogl will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Ronald Hemenway Contact through Kotchen & Low LLP	Mr. Hemenway will provide testimony concerning Wipro's pattern-or-practice of discrimination in its employment practices in favor of South Asians and Indians, his employment with Wipro and departure from Wipro, and harm from Wipro's discrimination.
Raghunath Rajan	Mr. Rajan will provide testimony concerning Wipro's staffing, benching, and termination practices, along with testimony concerning Mr. Phillips' time on the bench.
Karthi Murugaiyan	Mr. Murugaiyan will provide testimony concerning Wipro's hiring and staffing practices, along with testimony concerning Wipro's failure to re-hire Mr. Phillips in 2014.
Richard Prime	Mr. Prime will provide testimony concerning Wipro's hiring, staffing, and termination practices, along with testimony concerning Mr. Saemian's employment with Wipro, departure from Wipro, and Mr. Saemian's complaints regarding discrimination.
Jeannette Atkinson	Ms. Atkinson will provide testimony concerning Wipro's recruiting, hiring, and staffing policies and practices, including its affirmative action program and reports.
Amar Naga	Mr. Naga will provide testimony concerning Wipro's staffing policies and practices, including its localization program.
Ganesamoorthy Muthusamy	Mr. Muthusamy will provide testimony concerning Wipro's recruiting, hiring, and staffing policies and practices, including its localization plan.
Ramesh Dariya	Mr. Dariya will provide testimony concerning Wipro's immigration program and immigration policies and practices.
Justin Gray	Mr. Gray will provide testimony concerning Wipro's recruiting, hiring, and staffing policies and practices.
Tarika Mitchelson	Ms. Mitchelson will provide testimony concerning Wipro's human resources policies and practices.
Himanshu Srivastava	Mr. Srivastava will provide testimony concerning Wipro's recruiting, hiring, and staffing policies and practices.
Sunita Cherian	Ms. Cherian will provide testimony concerning Wipro's human resources policies and practices, as well as its diversity and inclusion, affirmative action, and EEO policies and practices.
Rohan Kamath	Mr. Kamath will provide testimony concerning Wipro's staffing practices and immigration program, including immigration policies and practices.
Saloni Sachdev	Ms. Sachdev will provide testimony concerning Wipro's human resources policies and practices, as well as its diversity and inclusion, affirmative action, and EEO policies and practices.

Plaintiffs reserve the right to add to, modify, and supplement this list of witnesses. Plaintiffs also reserve the right to call Wipro's any and all witnesses disclosed by Wipro, including its experts.

Dated: June 24, 2022

By: /s/Daniel Kotchen  
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Daniel Low (*pro hac vice*)  
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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record by electronic service through the Clerk of the Court's CM/ECF filing system.

Dated: June 24, 2022

By: /s/ Daniel Kotchen  
Daniel Kotchen